

1 I, Hong-An Vu, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for
2 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
3 within my own personal knowledge and if called as a witness, I could and would competently
4 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
5 Trucking’s Reply in Support of Its Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563),
6 requesting that the Court issue an order to enforce the June 7, 2017 order, strike Waymo’s
7 corrected supplemental initial disclosures, strike Waymo’s Patent Local Rule 3-8 contentions, and
8 preclude damages claims as to Otto Trucking.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of relevant excerpts of
11 Plaintiff Waymo LLC's First Supplemental Objections and Responses to Otto Trucking, LLC's
12 First Set of Interrogatories (Nos. 1-14), dated July 25, 2017.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and correct. Executed this 28th day of July, 2017 in Los Angeles, California.

/s/ Hong-An Vu
Hong-An Vu